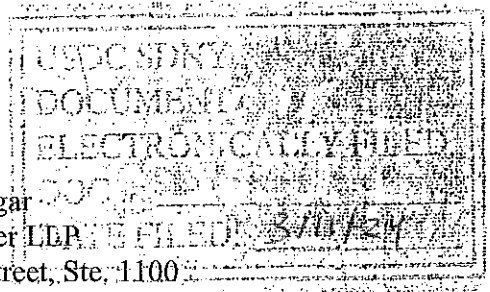


March 8, 2024

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BY CM/ECF & HAND DELIVERY

The Honorable Lewis A. Kaplan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: ***Telecom Business Solution, LLC, et al., v. Terra Towers Corp., et al.,***
Civil Action No.: 1:22-cv-01761

Your Honor:

We represent Telecom Business Solution, LLC and LATAM Towers, LLC (collectively, “Peppertree”), and AMLQ Holdings (Cay), Ltd. (“AMLQ,” together with Peppertree, “Peppertree/AMLQ”) in the above-captioned action (the “Action”). Pursuant to Federal Rule of Civil Procedure 5.2(d), Peppertree/AMLQ respectfully request leave to file under seal their Letter Motion regarding the Motion for Reconsideration filed by Respondents Terra Towers Corp., TBS Management, S.A., and DT Holdings, Inc. (together, “Respondents”) (ECF No. 212 *et seq.*) (the “Reconsideration Motion”) and that the Court order any response to the Letter Motion likewise be filed under seal.

By way of background, this Action relates to the American Arbitration Association matter of *Telecom Business Solution, LLC et al. v. Terra Towers Corp. et al.*, AAA Case No. 01-21-0000-4309 (the “Arbitration”). In a procedural order issued in August 2021, the tribunal presiding over the Arbitration (the “Tribunal”) ordered:

The Parties shall treat the details of the Arbitration as private and confidential, except to the extent necessary to comply with mandatory applicable laws, including regulatory obligations, court orders, or orders of a regulatory or an administrative body, or to comply with obligations to insurers, auditors, accountants, or investors. In such cases, the disclosure shall not extend beyond what is legally required and any non-governmental recipients shall commit to maintain the information in confidence.

ECF No. 6-1 (Procedural Order No. 2), ¶ 22 (the “Confidentiality Order”). This Confidentiality Order is consistent with the confidentiality provisions of the parties’ underlying shareholders agreement (the “Shareholders Agreement”), under which the parties agreed not to disclose any confidential information disclosed to it by another shareholder, subject to limited exceptions. *See* ECF No. 9-1 (Shareholders Agreement), § 6.03. The Letter Motion contains information

covered by the Confidentiality Order and the confidentiality provisions of the parties' Shareholders Agreement.

Thus, Peppertree/AMLQ respectfully request leave to file the Letter Motion under seal and that the Court order that any response to the Letter Motion also be filed under seal.

Respectfully submitted,

/s/ Gregg L. Weiner
Gregg L. Weiner

Counsel for AMLQ Holdings (Cay), Ltd.

/s/ Michael N. Ungar
Michael N. Ungar

*Counsel for Telecom Business Solution, LLC
and LATAM Towers, LLC*

CC: All Counsel of Record

Sealed
we
3/11/24